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March 27, 2023

**BY ECF**

Valerie E. Caproni, District Judge  
United States District Court for the  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: *United States v. Laureano*, 1:22-cr-00670 (VEC).

Dear Judge Caproni:

I represent Jonathan Laureano in the above-referenced matter. Trial in the case is scheduled to begin May 1<sup>st</sup>. Unfortunately, I have contracted COVID-19. I tested positive on Friday, am still quite ill, remain in quarantine, and am in a high-risk group based on my age. For this reason, I must request an adjournment of the trial and briefing schedule of about a month.

While the defense has been working diligently to be ready on May 1<sup>st</sup>, there remains a tremendous amount to be done, including a motion schedule that begins with a defense filing this Friday, and continues through April 14<sup>th</sup>. I am currently too ill to meet this schedule and cannot predict exactly when I will be better and able to do substantive work.

I also cannot predict when it will be safe for me to meet with my client at MDC Brooklyn. There are important decisions to be made, and I do not wish to jeopardize his health and that of the other inmates and staff at the facility. I will consult with my doctor and review the MDC guidelines before going there.

In addition, the government informed us today that they have succeeded in opening my client's cell phone and extracting information from it. The Court may recall that we had decided not to file a motion to suppress the phone because they had not been able to open it and were not intending to offer evidence from it. Now that they have, we have to consider whether a motion to suppress is appropriate, and review what is usually a substantial piece of discovery (which has not yet been provided to us).

Hon. Valerie E. Caproni  
March 27, 2023

While the need for an adjournment is unfortunate, we believe a month is modest under the circumstances. We are available the weeks of June 5<sup>th</sup> and June 12<sup>th</sup>.

We have conferred with the government. They object to more than a two-week adjournment.

Thank you for your attention to this application.

Very truly yours,

/s  
Jesse M. Siegel

Application GRANTED in part. Jury selection and trial, originally scheduled for May 1, 2023, is hereby ADJOURNED to **Tuesday, May 30, 2023 at 10:00 a.m.**

Defendant's *Daubert* motion, originally due March 31, 2023, is hereby ADJOURNED to **April 21, 2023**; the Government's opposition and cross-motion are due **April 28, 2023**; Defendant's reply and opposition are due **May 3, 2023**; the Government's reply, if any, is due **May 5, 2023**.

Pre-trial motions and motions *in limine* (not directed at experts) are due **April 21, 2023**; responses due **April 28, 2023**.

The Final Pretrial Conference is ADJOURNED to **Monday, May 22, 2023 at 2:30 p.m.**

The deadline for requests to charge and proposed *voir dire* is ADJOURNED to **May 10, 2023**.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Date: 3/28/2023